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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 BRIAN TERRANCE ALVAREZ-
10 GILBERG, an individual,

11 Plaintiff,

12 vs.

13 GEICO CASUALTY COMPANY, a
foreign corporation; DOES I through X;
and ROE CORPORATIONS I through
X, inclusive,

14 Defendants.

Case No.: 2:20-CV-01583-RFB-VCF

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE
HEARING ON PLAINTIFF'S
MOTION TO COMPEL
DISCOVERY AND
DEFENDANT'S AMENDED
MOTION FOR PROTECTIVE
ORDER**

15 Plaintiff, Brian Terrance Alvarez-Gilberg, (hereinafter "Plaintiff"), by and
16 through his attorneys of record, CLAGGETT & SYKES LAW FIRM, and
17 Defendant Geico Casualty Company, ("Defendant"), by and through its
18 attorneys of record, McCORMICK, BARSTOW, SHEPPARD, WAYTE &
19 CARRUTH LLP., hereby stipulate and request an order continuing the Hearing
20 on Plaintiff's Motion to Compel Discovery [Doc. No. 40] and Defendant's
21 Amended Motion for Protective Order [Doc. No. 42] currently scheduled for June
22 6, 2022 [Doc. No. 54]. Plaintiff served an Amended Notice of 30(b)(6) Deposition
23 on May 26, 2022 including additional topics that Defendant wishes to object to
24

and seek to protect. The parties met and conferred and now propose that they each be allowed to file a supplemental brief, in connection with Defendant's Motion to Protect, dealing only with the new 30(b)(6) topics. The proposed supplemental briefs will be filed on June 6, 2022.

Based on the foregoing, the parties respectfully request that the hearing be continued to the next available date convenient to the Court after June 13, 2022.

DATED this 26th day of May 2022.

CLAGGETT & SYKES LAW FIRM

/s/ Sean Claggett

Sean Claggett
Nevada Bar No. 8407
Attorneys for Plaintiff

DATED this 26th day of May 2022.

McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH
LLP

/s/ Jonathan Carlson

Jonathan Carlson
Nevada Bar No. 10536
Attorneys for Defendant

ORDER

IT IS HEREBY ORDERED that the hearing on Plaintiff's Motion to Compel Discovery [Doc. No. 40] and Defendant's Amended Motion for Protective Order [Doc. No. 42] currently set for June ~~6~~³, 2022 [Doc. No. 54], be rescheduled to the next available date convenient to the Court after June 13, 2022.

DATED this 27th day of May 2022.

IT IS HEREBY ORDERED that the video conference hearing scheduled for June 3, 2022, is RESCHEDULED to a video conference hearing on June 15, 2022 at 10:00 AM.


UNITED STATES MAGISTRATE JUDGE